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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Hernando Alberto Heredia,

Plaintiff,

v.

United States of America *ex rel.* United
States Postal Service,

Defendants.

Case No. 2:22-cv-01846-RFB-DJA

**Stipulation to Extend Joint Pretrial
Order Deadline**

(First Request)

Pursuant to Fed. R. Civ. P. 6(b)(1)(B), as well as LR IA 6-1, LR 26-3, Plaintiff Hernando Alberto Heredia (“Plaintiff”) and Defendant United States of America (“United States”), on behalf of the United States Postal Service (“USPS”), by and through their undersigned counsel, hereby request the Court extend the deadline to file a proposed joint pretrial order by 60 days from November 25, 2024, to **January 24, 2025**. Undersigned counsel for the United States has a significant briefing schedule over the next two months in addition to needing take periodic leave, and undersigned counsel for Plaintiff agrees to extending the deadline past the busy November and December holiday season. For these reasons, the parties respectfully request the Court grant their stipulation to extend the joint pretrial order deadline to January 24, 2025.

This is the first request to extend the deadline to file a proposed joint pretrial order. This request for an extension is made in good faith and not for the purpose of causing undue delay and prejudice.

1 Respectfully submitted this 4th day of November 2024.

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3 JASON M. FRIERSON
4 United States Attorney

HICKS & BRASIER, PLLC

5 /s/ Virginia T. Tomova
6 VIRGINIA T. TOMOVA
7 Assistant United States Attorney

/s/ Betsy C. Jefferis-Aguilar
BETSY C. JEFFERIS-AGUILAR
Attorney for Plaintiff

8 **IT IS SO ORDERED:**

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11 **UNITED STATES DISTRICT COURT JUDGE**

12 **DATED:** November 5, 2024